

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: LARRY WAYNE WILLIS, JR.
BAILIN MING EMOTO WILLIS, Debtors**

**Case No. 19-52511-KMS
CHAPTER 13**

MOTION TO APPROVE MORTGAGE MODIFICATION

COME NOW, Debtors, by and through counsel in the above styled cause and file this Motion to Approve Mortgage Modification and would show unto the Court the following:

1. On December 19, 2019, Debtors filed a bankruptcy petition under chapter 13 of the bankruptcy code.
2. Creditor Pennymac Loan Services has offered and the Debtors agree to a loan modification (Exhibit "A") for Debtor's mortgage.

The proposed modified terms are as follows:

1. New Unpaid Principal Balance - \$115,254.82
2. New Fixed Interest Rate – 3.375%
3. New Term – 309 months
4. Maturity Date – June 1, 2047
5. Principal and Interest Payment – \$558.75
6. Estimated Total Payment Including Escrow – \$795.63

WHEREFORE, Debtors pray that the Loan Modification with Pennymac Loan Services attached as Exhibit "A" be approved, and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to Approve Mortgage Modification was forwarded on October 25, 2021, to the creditor, case trustee and U.S. Trustee as indicated in the “21 day notice” that accompanies this Objection.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.